



MARYLAND TURFGRASS COUNCIL RESPONSE TO THE EPA CHESAPEAKE BAY'S TMDL PLAN

November 7, 2010

The Maryland Turfgrass Council (MTC) would like to respond to EPA's draft proposal for TMDL diet plan to the Chesapeake Bay. MTC represents Turfgrass stakeholders including golf courses, sod productions, lawn cares and sports turfs. We have 1200 members and we value our impact on the Chesapeake Bay eco –system and would like to work with EPA in limiting the TMDL to the Bay.

Steps already taken:

Golf Courses

1. Nutrient management plans are in place
2. Water quality measurements are taken monthly
3. Tight budgets limit the overuse of fertilizers
4. Locally produced poultry manure are used in most courses
5. Total turf cover limits the sediment runoff to zero
6. Increase use of mechanical management practices i.e. aeration
7. Increase participation in voluntary organizations i.e. Audubon Society (AS)

Sod productions

1. Nutrient management plans are in place
2. Budget impacts overuse of fertilizers
3. Newly laid sod is an important component for erosion and sediment control

Lawn cares

1. Have limited applications of phosphorus
2. Budget restraints limit over application
3. Standard practice is implemented which is remove any over application on hard surfaces
4. Increase use of mechanical management practices i.e. aeration

Homeowner Lawn cares

1. Retailers have limited phosphorus content in fertilizers
2. Increase acceptance of organic slow release fertilizers
3. Extension services are educating homeowners on proper application

Sports turfs

1. Education though the Sports Turf Management Association (STMA)
2. Increase use of mechanical management practices i.e. aeration
3. Reduction in fertilizer applications due to the increase use of artificial turf

Maryland Turfgrass Industry acknowledges these specified contaminants that are currently being addressed:

Nitrogen

1. More acceptable use of organic slow release nitrogen
2. Organic nitrogen has lower available nitrogen rates

Phosphorus

1. Lawn care, golf course , etc. have used fertilizers with little or no phosphorus
2. Phosphorus application is only used for seeding and new sod establishment

Sediments

1. Experts in the industry recognizes that when a healthy Turfgrass is well-maintained, you have little or no sediment moving off site
2. Sediment runoff occurs at new construction sites and on hard surfaces where no Turfgrass exists.
3. Turfgrass is nature's best water filter.

Benefits of healthy Turfgrass

- Turfgrass provides a runoff sink and recharges ground water reserves.
- Turfgrass provides a living biological surface with usable space for people to walk, play and recreate.
- Turfgrass provides a green expanse for visible security.
- Turfgrass can provide a temporary area for storage and parking that recovers quickly from these measures.

Storm Water Runoff

Most of Maryland's Storm Water Management (SWM) systems were designed and built over 50 years ago with the aim to remove as much water as quickly as possible. Retro fitting and redesigning is a necessary solution for urban and suburban runoff. This is an expensive, but extremely important part of MS4 development. Urban nutrient management is increasingly difficult because of the vast number of sites. When SWM system starts to fail, they are typically rebuilt to the original specifications instead of being retrofitted to current designs needed. Leaf collection has been cancelled at some municipalities because of budget restraints.

Leaf removal should be a required activity for all developed properties as leaves contain a high degree of phosphorus. Maintenance is rarely done to remove contaminants from storm water intakes. Turfgrass can be an important part in achieving these goals of slowing down and filtering out storm water. Rain gardens have become popular recently in urban and suburban areas. This development should be promoted through education to the public.

Non-point sources

Turfgrass is typically wrongly viewed as a non-point source of pollution. As non-point sources are difficult to identify and the EPA has limited authority to restrict them, it would be better to concentrate efforts on point sources such as agriculture, waste water treatment plants, and erosion control on construction sites. These point sources will be much easier to calculate reductions in TMDL. Non point sources can be best reduced by education and acceptance of an environmentally friendly practice developed together with the green industry, environmental and local jurisdictions. The Maryland Turfgrass Council would like to work with the EPA and Maryland State government to develop strategies in order to achieve consumer and green industry compliance, and cleaner water standards for our State.

The Maryland Turfgrass Council has been providing funding for the University of Maryland's Turfgrass program for over 30 years. We also provide education through our annual educational programs, our website and our periodical magazine. Biannually, we invite the public to The Maryland Turfgrass Farm to see the demonstration plots and to witness the ongoing research done by the Turfgrass program at University of Maryland College Park. We feel that the continued education and research are the best solutions to solve the misconception that a healthy Turfgrass is causing pollution problems in the Chesapeake Bay. Turfgrass is part of the solution and not part of the problem.

Sincerely,

Nicholas Alan Gammill
President, Maryland Turfgrass Council